

FILED  
IN CLERK'S OFFICE  
US DISTRICT COURT E.D.N.Y.  
\* MARCH 26, 2024 \*  
BROOKLYN OFFICE

ALK:AP/AS  
F. #2024R00229

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK  
----- X

UNITED STATES OF AMERICA

- against -

YUE ZHOU,

Defendant.

----- X

THE GRAND JURY CHARGES:

I N D I C T M E N T

Cr. No. 24-CR-123

(T. 18, U.S.C., §§ 981(a)(1)(C), 1958(a),  
2 and 3551 et seq.; T. 21, U.S.C.,  
§ 853(p); T. 28, U.S.C., § 2461(c))

Judge Diane Gujarati  
Magistrate Judge Taryn A. Merkl

MURDER-FOR-HIRE

1. On or about March 29, 2019, within the Eastern District of New York and elsewhere, the defendant YUE ZHOU, together with others, did knowingly and intentionally use and cause another to use one or more facilities of interstate commerce, to wit: one or more cellular telephones and the Internet, with intent that a murder be committed in violation of New York Penal Law Section 125.25, to wit: the murder of Jane Doe #1, an individual whose identity is known to the Grand Jury, as consideration for the receipt of, and as consideration for a promise and agreement to pay, something of pecuniary value.

(Title 18, United States Code, Sections 1958(a), 2 and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION

2. The United States hereby gives notice to the defendant that, upon her conviction of the offense charged herein, the government will seek forfeiture in accordance with Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code,

Section 2461(c), which require any person convicted of such offense to forfeit any property, real or personal, constituting, or derived from, proceeds obtained directly or indirectly as a result of such offense.

3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 981(a)(1)(C); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

A TRUE BILL

  
\_\_\_\_\_  
FOREPERSON

*By Carolyn Pokorny, Assistant U.S. Attorney*  
\_\_\_\_\_  
BREON PEACE  
UNITED STATES ATTORNEY  
EASTERN DISTRICT OF NEW YORK

No. \_\_\_\_\_

---

**UNITED STATES DISTRICT COURT**

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

---

THE UNITED STATES OF AMERICA

vs.

YUE ZHOU,

Defendant.

---

**INDICTMENT**

(T. 18, U.S.C., §§ 981(a)(1)(C), 1958(a), and 3551 et seq.;  
T. 21, U.S.C., § 853(p); T. 28, U.S.C., § 2461(c))

---

*A true bill.*



\_\_\_\_\_  
*Foreperson*

---

Filed in open court this \_\_\_\_\_ day,

of \_\_\_\_\_ A.D. 20 \_\_\_\_\_

\_\_\_\_\_  
*Clerk*

---

Bail, \$ \_\_\_\_\_

\_\_\_\_\_

---

*Amanda Shami, Assistant U.S. Attorney (718) 254-7528*